

FIERST, PUCCI & KINDER LLP

ATTORNEYS AT LAW
64 GOTHIC STREET
NORTHAMPTON, MASSACHUSETTS 01060-3042

(413) 584-8067

TELECOPIER (413) 585-0787

EMAIL: (recipient's name)@fierstpuccl.com

WEBSITE: www.fierstpuccl.com

FREDERICK U. FIERST*
JOHN P. PUCCI
C. JEFFREY KINDER**

JONATHAN J. KANE***
OF COUNSEL

WALTER C. SOMOL

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2004-1 A 11 29

U.S. DISTRICT COURT
DISTRICT OF MASS.

February 27, 2004

William Welch, Esquire
Assistant U.S. Attorney
U.S. Attorney's Office
1550 Main Street
Springfield MA 01103

Re: U.S. v. Paul Calcasola, Criminal No. 04-CR-30002-MAP

Dear Mr. Welch:

Please consider this letter a request pursuant to Local Rule 116.3(A) for the following additional discovery in the above-captioned criminal case:

1. The criminal history of Stephen Lewis;
2. The Information to which Stephen Lewis has agreed to plead guilty as referred to in Paragraph 1 of the plea agreement;
3. Identification of the prior false statements made by Stephen Lewis in proffers related to (1) Paul Calcasola and Elisabel Rivas, and (2) Mark McCarthy and RCML as referred to in Paragraph G of your letter dated February 12, 2004.
4. Any promises made to Stephen Lewis related to his prosecution for conspiracy to commit bank fraud;
5. Any information related to Stephen Lewis' participation in other bank fraud schemes or other criminal activity generally;
6. early disclosure of the grand jury transcript of Stephen Lewis;
7. evidence the government intends to offer pursuant to Fed. R. Evid. 404(b);

* ALSO ADMITTED IN NEW YORK

** ALSO ADMITTED IN COLORADO

*** ALSO ADMITTED IN NEW HAMPSHIRE AND CONNECTICUT

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8. co-conspirator hearsay statements;

Thank you for your cooperation and please call me at (413)
584-8067 if you have any questions.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. Jeffrey Kinder".

C. Jeffrey Kinder

CJK/hs

Copy to: Clerk, U.S. District Court ✓
Paul Calcasola
Judith Knight